



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

February 26, 2021

**BY ECF & ELECTRONIC MAIL**

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Ghislaine Maxwell*, 20 Cr. 330 (AJN)**

Dear Judge Nathan:

The Government respectfully submits under seal the enclosed unredacted version of its memorandum of law and accompanying exhibits in opposition to the defendant's twelve pre-trial motions. Additionally, the Government respectfully submits proposed redactions to its memorandum of law and three exhibits, Exhibits 1, 5, and 7. Consistent with the redactions contained in the defendant's motions, the Government's proposed redactions are narrowly tailored to (1) cover information implicating the privacy interests of third parties, (2) cover Confidential Material produced by the Government in discovery and governed by paragraph 15 of the Protective Order in this case (Dkt. 36), (3) cover information submitted under seal to other judicial officers or information another judicial officer has determined should remain under seal, and (4) protect the integrity of the Government's ongoing investigation.

In addition, the Government respectfully requests that certain exhibits be filed entirely under seal. In particular, the Government respectfully submits that (1) Exhibits 8 and 9, filings submitted under seal to other judicial officers, should similarly be filed under seal in this case while the Government's grand jury investigation remains ongoing; and (2) Exhibit 11 should be filed under seal because it contains information which another judicial officer has determined should remain under seal.

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Accordingly, the Government respectfully requests that the Court permit the Government to publicly file its memorandum of law and exhibits with the enclosed proposed redactions.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

By: s/  
Maurene Comey / Alison Moe /  
Lara Pomerantz / Andrew Rohrbach  
Assistant United States Attorneys  
Southern District of New York

Cc: All Counsel of Record (By email)